



November 1, 2016

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch,

**Re: Section 63.71 Application of Interstate Telecommunications Cooperative, Inc.
for Authority to Discontinue Certain Services**

Vantage Point Solutions respectfully files the enclosed Application of Interstate Telecommunications Telephone Cooperative, Inc. for Authority to Discontinue Certain Services. This filing is made in compliance with Section 63.71 of the Commission's rules (47 C.F.R. § 63.71).

Sincerely,

Lori Sherwood
Vantage Point Solutions

on behalf of

Jerry Heiberger
General Manager
Interstate Telecommunications Cooperative, Inc.

Enclosures

cc: Jerry Heiberger

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of)	
)	File No. _____
Interstate Telecommunications Cooperative, Inc.)	
)	
For Authority Pursuant to Section 214 of)	
The Communications Act of 1934, As Amended,)	
To Discontinue Certain Services)	

**SECTION 63.71 APPLICATION OF INTERSTATE
TELECOMMUNICATIONS COOPERATIVE, INC.**

Pursuant to Section 214(a) of the Communications Act of 1934, as amended,¹ and Section 63.71 of the Federal Communications Commission's rules,² Interstate Telecommunications Cooperative, Inc. (the "Company") hereby files this application requesting authority to discontinue certain Operator Services, including Busy Line Verification (BLV) and Busy Line Interruption (BLI) services, to customers the Company serves in the State of South Dakota ("Application").³

In support of this Application, Interstate Telecommunications Cooperative, Inc. submits the following information:

I. Information Required by Section 63.71(a)(1) – (4)

A. Name and Address of Carrier

Interstate Telecommunications Cooperative, Inc.

For purposes of this Application, the Commission may contact:

Jerry Heiberger
General Manager
Interstate Telecommunications Cooperative, Inc.

¹ See 47 C.S.C. § 214(a).

² See 47 C.F.R. § 63.71.

³ As required by Section 63.71(a) of the Commission's Rules, Interstate Telecommunications Cooperative has notified and submitted a copy of this Application concurrent with this filing to the South Dakota Public Utilities Commission, the Governor of South Dakota, and the Secretary of the U.S. Department of Defense.

312 Fourth Street West
Clear Lake, SD 57226
605-874-2181
Jerry.heiberger@itctel.com

B. Date of Planned Service Discontinuance

Interstate Telecommunications Cooperative, Inc. plans to discontinue BLV and BLI services (collectively, “Affected Services”) to its customers in the State of South Dakota on or after January 1, 2017 subject to the necessary federal and state regulatory approvals.

C. Points of Geographic Areas of Service Affected

Interstate Telecommunications Cooperative, Inc. will discontinue the Affected Services to local exchange customers in the Company’s service area of Northeast South Dakota which includes portions of Day, Roberts, Grant, Clark, Codington, Hamlin, Deuel, Kingsbury, Brookings, Lake, Moody, and Spink counties and Southwest Minnesota which includes portions of Lac qui Parle, Lincoln, Pipestone and Yellow Medicine counties.

D. Brief Description of the Types of Services Affected

In the areas referenced above, Interstate Telecommunications Cooperative, Inc. is discontinuing the following Operator Services:

1. **Busy Line Verification (BLV)** - allows an operator to establish a “talking” connection to an apparently busy station line to determine if the station line is in working order.
2. **Busy Line Interruption (BLI)** – allows an operator to interrupt a voice conversation in progress on a line to advise the interrupted subscriber that the interrupting party has a need to reach the subscriber.

This discontinuance is limited to the Affected Services. Customers will continue having access to all other existing services without interruption.

II. Brief Description of the Dates and Methods of Notice to All Affected Customers

Interstate Telecommunications Cooperative, Inc. sent customer notification letters to its local exchange customers through U.S. Mail as a bill insert on September 30, 2016. Please reference Exhibit A, which provides a sample copy of the notification letter sent to affected customers. While the customer notification letter was dated October 1, 2016, the notice was included in the October 1st, 2016 customer bill as a bill insert and printed on distinctly colored paper to attract attention to it. Interstate Telecommunications Cooperative, Inc. decided a bill insert would serve as the most effective and economic

method of reaching its customers. In addition, Interstate Telecommunications Cooperative, Inc. also provided notification on its website/newsletter at <http://itc-web.com/policies-information/discontinuance-certain-operator-services/>.

Copies of this Application have been sent to the South Dakota Public Utilities Commission, the South Dakota Governor, the Minnesota Public Utilities Commission, the Minnesota Governor, and the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.

III. Status of Carrier

Interstate Telecommunications Cooperative, Inc. is a non-dominant carrier.

IV. Circumstances of Discontinuance

The Company's discontinuance of the Affected Services was prompted by its scheduled migration from the Time Division Multiplexing (TDM) platform to a new softswitch platform, which utilizes session initiated protocol (SIP). The low market demand also prompted the decision to discontinue the Affected Services. From January 1, 2015 through May 24, 2016, the Company only had 4 instances of customers utilizing BLV service, and had 1 instance of customers utilizing BLI service. The growth of other communications methods, including text messaging, mobile phones, email and other social media applications, has reduced customer demand for the Affected Services. The discontinuance of the BLV and BLI Operator Services will not adversely affect the Company's customers, as the vast majority of the market has already replaced the Affected Services with other communications methods.

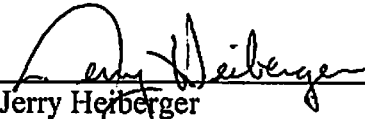
V. Certification

On behalf of Interstate Telecommunications Cooperative, Inc., I, Jerry Heiberger, the undersigned General Manager/Operations Manager, hereby certify that the statements contained herein are true, complete and correct to the best of my knowledge and made in good faith.

VI. Conclusion

For the reasons stated herein, the Company respectfully requests the Commission grants this Application.

Respectfully Submitted,



Jerry Heiberger
General Manager
Interstate Telecommunications Cooperative, Inc.
312 Fourth Street West
Clear Lake, SD 57226
605-874-2181
Jerry.heiberger@itctel.com

10/31/16
Date

CERTIFICATE OF SERVICE

I hereby certify that Interstate Telecommunications Cooperative, Inc.'s Section 63.71 Application to discontinue the Operator Services discussed herein was served on October 31, 2016, by mailing copies by first class U.S. Mail, to the following persons at the addresses listed below.

Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
Capitol Building
500 E. Capitol Ave.
Pierre, SD 57501

Office of Governor Dennis Daugaard
State of South Dakota
Capitol Building
500 E Capitol Ave.
Pierre, SD 57501

Office of the Governor, Mark Dayton
State of Minnesota
116 Veterans Service Building
20 W 12th Street
St. Paul, MN 55155

Beverly Jones Heydinger, Chair
Minnesota Public Utilities Commission
121 7th Place E
Suite 350
Saint Paul, Minnesota 55101

U.S. Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

EXHIBIT A

CUSTOMER NOTIFICATION



Special Notice

October 1, 2016

Re: Notice of Discontinuance of Certain Operator Services

Dear Valued Customer:

This letter is to inform you that Interstate Telecommunications Cooperative, Inc. (ITC) will no longer be providing certain legacy operator services on or after January 1, 2017, pending federal and state regulatory approval. Specifically, the following operator services will be discontinued.

- **Busy Line Verification (BLV)** – An operator service allowing an operator to establish a connection to confirm when a line is idle or in use.
- **Busy Line Interruption (BLI)** – An operator service allowing an operator to interrupt a voice conversation in progress on a line and advise the interrupted subscriber that an interrupting party needs to reach the subscriber.

This discontinuance is limited to the operator services listed above and will not affect your communications service in any other way. Customers will continue having access to general operator services, including the following: directory assistance, directory assistance with call completion, operator assisted dialing, operator person-to-person calls, operator third number billing calls, and operator station paid domestic and international calls.

In 2015, ITC had less than five instances of customers utilizing BLV and/or BLI services. Customer demand for BLV and BLI operator services has declined as mobile phones, text messaging, email and other social media applications have increased in popularity.

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of (carrier's name). Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

If you have any questions about this notice, please contact us at 1.800.417.8667. We thank you for your business and look forward to continuing to serve your communications needs.

Sincerely,

A handwritten signature in black ink, enclosed in a rectangular box. The signature appears to read "Jerry Heiberger".

Jerry Heiberger, General Manager
Interstate Telecommunications Cooperative, Inc.
Clear Lake, SD 57226